

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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STUART JAMES MULLER,

Plaintiff,

v.

JIUN-LIANG CHEN a/k/a RICKY CHEN  
and ZHAOJIE TECHNOLOGY  
INTERNATIONAL CO. LIMITED d/b/a  
ION ELECTRONIC MATERIALS CO.,  
LTD.,

Defendants.

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Case No. 1:23-cv-12662-PGL

**DECLARATION OF R. TERRY PARKER  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR SERVICE OF PROCESS BY CLERK OF COURT**

I, R. Terry Parker, hereby declare as follows:

1. I am counsel for the plaintiff Stuart James Muller (the "Plaintiff") in the above-referenced action. I submit the declaration in support of Plaintiff's Motion for Service of Process by Clerk of Court.

2. On November 3, 2023, Plaintiff initiated this action against Defendants. See ECF No. 1.

3. On November 13, 2023, copies of the summons and complaint were mailed by FedEx, together with a request for waiver of service pursuant to Rule 4(d), to Chen at his last known work address: Richy Chen, Zhaojie Technology International Co., No. 195 Xiangxi Road, Hsinshu County, Hu Kou, Taiwan, Republic of China.

4. On November 13, 2023, copies of the summons and complaint were mailed by FedEx, together with a request for waiver of service pursuant to Rule 4(d), to the IEM at its last

known address: Zhaojie Technology International Co., No. 195 Xiangxi Road, Hsinshu County, Hu Kou, Taiwan, Republic of China, No. 195 Xiangxi Road, Hsinshu County, Hu Kou, Taiwan, Republic of China.

5. On November 29, 2023, Plaintiff's correspondence to Chen containing copies of the summons and complaint was returned to the undersigned counsel.

6. On November 29, 2023, Plaintiff's correspondence to IEM containing copies of the summons and complaint was returned to the undersigned counsel.

7. With respect to the copies of the summons and complaint mailed to Chen by FedEx, the undersigned counsel understands from the tracking service at FedEx that delivery was refused by the recipient.

8. With respect to the copies of the summons and complaint mailed to IEM by FedEx, the undersigned counsel understands from the tracking service at FedEx that delivery was refused by the recipient.

9. On or about December 15, 2024, Plaintiff sought counsel from attorneys in the United States with experience in the area of international service of process in Taiwan.

10. In or about February 1, 2023, Plaintiff sought assistance from counsel in Taiwan to serve Defendants in accordance with Taiwanese law as permitted by Rule 4(f)(A)(2) of the Federal Rules of Civil Procedure.

11. On April 9, 2024, the undersigned counsel was informed by Plaintiff's Taiwan counsel that copies of the summons and complaint for IEM were personally delivered to a representative of IEM at the address No. 195 Xiangxi Road, Hsinshu County, Hu Kou, Taiwan, Republic of China.

12. On April 9, 2024, the undersigned counsel was informed by Plaintiff's Taiwan counsel that a representative of IEM informed Plaintiff's Taiwan Counsel that Chen no longer worked at IEM.

13. On April 19, 2024, accordingly to Plaintiff's Taiwan counsel, four individuals in surgical masks entered the offices of Plaintiff's Taiwan counsel, one of whom threw copies of the summons and complaint for IEM at Plaintiff's Taiwan counsel, while two of the other individuals filmed the incident before leaving the offices of Plaintiff's Taiwan counsel. As Plaintiff's Taiwan counsel described it: "Last Friday (April 19), Zhaojie sent a group of four people to harass our law firm and literally threw the documents back to us; see the attached video, identifying four people with masks entering the elevator. In addition, the seal of the envelope enclosing the documents was obviously broken. I never expected such uncivilized behavior to happen to my law firm, and I don't want it to happen again."

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States.

Executed on this 29th day of April, 2024.

/s/ R. Terry Parker

R. Terry Parker